

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 17-64 (DWF/KMM)

UNITED STATES OF AMERICA,)
)
Plaintiff,) **GOVERNMENT'S MOTION TO**
) **EXTEND FILING DEADLINE**
v.)
)
EDWARD S. ADAMS,)
)
Defendant.)

The United States of America, by and through its attorneys, Erica H. MacDonald, United States Attorney for the District of Minnesota, and John Kokkinen, Assistant United States Attorney, respectfully submits this motion requesting an additional four days, until July 27, 2018, to respond to defendant's motion to dismiss and to file a motion contesting the application of privilege.

The current deadlines require the government to file three submissions by the end of July 23, 2018: a response to Mr. Adams's motion to suppress, a response to Mr. Adams's motion to dismiss, and a motion contesting the application of privilege. The response to the motion to suppress—the largest of the three submissions—is complete and will be filed pursuant to the current deadline. The response to the motion to dismiss is nearly complete, but additional work is required to fully respond to all of Mr. Adams's arguments. In addition, the government requires more time to research the issues that inform its motion contesting the application of privilege. Accordingly, the government respectfully requests an extension of four days, until July 27, 2018, to submit its response to Mr. Adams's motion

to dismiss and to file its own motion contesting the application of privilege. The government has conferred with Mr. Adams's attorneys, who have stated that they have no objection to the requested continuance so long as the Court grants an in-kind extension of the deadline for their reply to the government's response to the motion to dismiss and their response to the motion contesting the application of privilege.

Dated: July 23, 2018

Respectfully Submitted,

ERICA H. MacDONALD
United States Attorney

/s/ John Kokkinen

BY: JOHN KOKKINEN
Assistant U.S. Attorney